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Attorneys for Plaintiff
PHYSICIANS HEALTHSOURCE, INC. and the Proposed Class

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

PHYSICIANS HEALTHSOURCE,
INC.,

Plaintiff,

v.

MASIMO CORPORATION, et al.

Defendants.

Case No. 8:14-cv-00001 JVS (ANx)

Judge James V. Selna
Mag. Judge Autumn D. Spaeth

**DECLARATION OF RAHDA
GEISMANN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT TO ADD
ADDITIONAL PARTY PLAINTIFF**

HEARING:

Date: March 11, 2019
Time: 1:30 p.m.
Ctmm: 10C

1 I, Rahda Geismann, declare as follows:

2 1. I am over 21 years of age and competent to make this declaration.

3 2. I have personal knowledge of the facts and matters alleged herein
4 and can competently testify to same.

5 3. I understand that this class action seeks relief under the Telephone
6 Consumer Protection Act of 1991, 47 U.S.C. § 227, et seq. ("TCPA") on behalf
7 of Gorss Motels, Inc. and a class of persons who received advertising faxes
8 from Defendants.

9 4. I understand that the TCPA authorizes injunctive relief and
10 recovery of \$500 per violation, and that amount can be trebled if the Court
11 determines that the violations were willful or knowing.

12 5. My intention in this case is to act on behalf of the Class and obtain
13 recovery on behalf of the Class.

14 6. On November 28, 2018, I signed a retainer agreement with my
15 counsel in this matter.

16 7. I received the unsolicited fax advertisement attached to the Second
17 Amended Complaint on my fax machine.

18 8. I understand that I have a duty to protect the interests of the other
19 class members.

20 9. I am not aware of any conflicts of interest between myself and the
21 other class members.

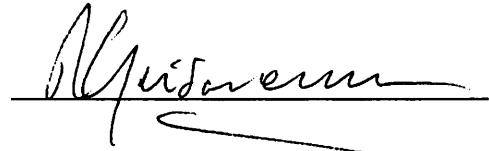
22 10. At no time have I been offered money in exchange for my claims
23 against Defendants. I have not and will not consider any individual settlements
24 in this matter as I seek to be a class representative in this matter.

25 11. On or about February 20, 2019, I was made aware that Defendants,
26 without my authorization, wired \$5,000 to one of the law firms representing me
27 to attempt to moot my claims in this matter. I do not accept this \$5,000 as I seek
28 to be a class representative in this matter.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2019

A handwritten signature in black ink, appearing to read "A. Guisarm", is written over a horizontal line. A long, thin, curved line extends from the bottom of the signature towards the right margin of the page.